

UNITED STATES BANKRUPTCY COURT
FOR THE MIDDLE DISTRICT OF PENNSYLVANIA

IN RE: : CHAPTER 13
RONALD DALLEY :
 :
 : CASE NO. 5-15-05200
Debtor(s) :

DEBTOR'S ANSWER TO TRUSTEE'S MOTION TO DISMISS

AND NOW COMES, Ronald Dalley, the Debtor, and files an Answer to the Trustee's Motion to Dismiss and states the following:

1. Ronald Dalley, (hereinafter the "Debtor") filed a Chapter 13 bankruptcy proceeding with the U.S. Bankruptcy Court for the Middle District of Pennsylvania.
2. Charles J. DeHart, III, Esq. is the standing Chapter 13 Trustee.
3. The Trustee filed a Motion to Dismiss the Debtor's Chapter 13 case stating the Plan is non confirmable.
4. Debtor's Counsel is waiting for information from the Debtor. Said information is necessary to prepare and accurately file an amended Chapter 13 Plan.

WHEREFORE, the Debtors respectfully request that Trustee's Motion to Dismiss be denied.

Respectfully submitted,

Date February 16, 2017

/s/Tullio DeLuca
Tullio DeLuca, Esquire
PA ID# 59887
381 N. 9th Street
Scranton, Pa 18504
(570) 347-7764

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CERTIFICATE OF SERVICE

The undersigned hereby certifies that on February 16, 2017 caused a true and correct copy of
Debtor's Answer to Trustee's Motion to Dismiss to be served via electronic filing in the above-
referenced case, on the following:

Charles J. DeHart, III, Esq. at dehartstaff@ramapo.com

Dated: February 16, 2017

/s/Tullio DeLuca
Tullio DeLuca, Esquire